

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Fred L. Nance Jr.)	
)	Case No. 20 CV 06316
Plaintiff,)	
)	Honorable Judge: Jorge L. Alonso
vs.)	
)	Honorable Magistrate Judge:
Department of Justice, Bureau of Justice)	
Assistance, Office of Justice Programs,)	Beth W. Jantz
EMAGES, Inc., Hattie Wash, Thomas)	
Bradley, et al.)	Courtroom: 1903
Defendants.)	

Motion for Default against Defendant Thomas Bradley

NOW COMES, pro se plaintiff Fred L. Nance Jr., respectfully requesting default against Thomas Bradley pursuant to service of process specified in Rule 4 of the Federal Rules of Civil Procedure, which the preferred approach is for the plaintiff to mail the defendant a copy of the complaint and summons and/or obtain a waiver of personal service from the defendant under Rule 4(d); and if the defendant does not waive service and if no federal statute otherwise supplies a method for serving process, then Rule 4(e)'s list of methods is exclusive: personal service (Rule 4(e)(2)(A)); leaving a copy of the complaint and summons at the defendant's "usual place of abode" with someone of suitable age and discretion who resides there (Rule 4(e)(2)(B)); delivering a copy of the complaint and summons to an agent authorized to accept service (Rule 4(e)(2)(C)); or any other manner of serving process permitted by the law of the state where the district court sits (Rule 4(e)(1)). Plaintiff submits the following to support his motion for default.

1. On October 23, 2020 plaintiff filed a Federal complaint #20-cv-06316 with the Northern District of Illinois.

2. Plaintiff filed a Summons in a Civil Action with the Northern District of Illinois, Eastern Division, against defendant Thomas Bradley (hereinafter, "Bradley") on October 26, 2020. (Exhibit 1)

3. On October 26, 2020 plaintiff sent 3 copies of the Federal complaint and Summons to defendants EMAGES, Inc., Hattie Wash, and Thomas Bradley via Certified Mail to 7601 South Kostner, Suite 500, Chicago, Illinois 60652. (Exhibit 2)

4. On October 28, 2020 plaintiff received an email delivery notice from the United States Postal Service and EMAGES, Inc. signed certificate of receipt for certified mail. (Exhibit 3)

5. On October 28, 2020 plaintiff sent an email to defendant Bradley (tbacpa52@yahoo.com) regarding the service of the complaint and summons delivered to EMAGES, Inc. (Exhibit 4)

6. Defendant Bradley is the Certified Public Accountant responsible for, and noted in the complaint, the financial accounting of Second Chance Act Grant #2018-CY-BX-0025.

7. The email address plaintiff used to send the complaint and summons to defendant Bradley is the same email used during the entirety of Second Chance Act grant #2018-CY-BX-0025, which is primary in this litigation.

8. On November 5, 2020 plaintiff forwarded an email sent to defendant Thomas Bradley receiving notice from DOJ, BJA, OJP, EMAGES, Inc., and Hattie Wash via this email address (tbacpa52@yahoo.com) for an audit on December 1, 2020, which defendant Bradley will attend. (Exhibit 5)

9. On November 13, 2020 Attorney Derrick M. Thompson Jr. filed his appearance in this matter for EMAGES, Inc. and Hattie Wash.

10. On November 20, 2020 this Honorable Court granted Pro Hac Vice to Attorney Janica Pierce Tucker.

11. On November 21, 2020 plaintiff sent an email to defendant Bradley, copying Attorney Thompson and his co-counsel Janica Pierce Tucker, stating plaintiff was going to address a Motion for Default against him. (Exhibit 6)

12. On November 23, 2020 plaintiff sent an email to Attorneys Thompson and Pierce requesting the physical address of their client's consultant, defendant Bradley. (Exhibit 7)

WHEREFORE, plaintiff states he has attempted, multiple times to get defendant Bradley to acknowledge the complaint and service of summons. Plaintiff respectfully request this court find defendant Bradley in default.

Respectfully submitted,

/s/Fred L. Nance Jr., Ph.D.
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